

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

SAMUEL KATZ, *et al.*, individuals, on their)
own behalf and on behalf of all others)
similarly situated,)
Plaintiffs,)
)
v.)
)
LIBERTY POWER CORP., LLC, *et al.*,)
Defendants.)

Case No. 1:18-cv-10506-ADB

**DEFENDANTS LIBERTY POWER CORP., LLC AND LIBERTY POWER
HOLDINGS, LLC'S ASSENTED-TO MOTION TO EXCEED PAGE LIMIT**

Defendants Liberty Power Corp., LLC and Liberty Power Holdings, LLC (collectively, “Defendants”) respectfully request leave to file a memorandum of law in support of their forthcoming Consolidated Motion to Dismiss Plaintiffs’ First Amended Class Action Complaint in excess of the 20-page limit imposed by Local Rule 7.1(b)(4), by up to fifteen (15) additional pages. In support thereof, Defendants refer the Court to the accompanying memorandum in support filed herewith.

**LIBERTY POWER CORP., LLC,
LIBERTY POWER HOLDINGS, LLC,**

By their attorneys,

/s/ Pamela C. Rutkowski

Craig R. Waksler (B.B.O. # 566087)

Pamela C. Rutkowski (B.B.O. # 681618)

ECKERT SEAMANS CHERIN &
MELLOTT, LLC

Two International Place, 16th Floor

Boston, MA 02110-2602

Telephone: 617.342.6800

Facsimile: 617.342.6899

cwaksler@eckertseamans.com

prutkowski@eckertseamans.com

Charles A. Zdebski (*pro hac vice*)

Jeffrey P. Brundage (*pro hac vice*)

ECKERT SEAMANS CHERIN &
MELLOTT, LLC

1717 Pennsylvania Avenue, N.W.

12th Floor

Washington, DC 20006

Telephone: 202-659-6676

Facsimile: 202-659-6699

Email: czdebski@eckertseamans.com

Email: jbrundage@eckertseamans.com

Dated: August 2, 2018

LOCAL RULE 7.1(a)(2) CERTIFICATE OF COMPLIANCE

I, Pamela C. Rutkowski, counsel for Defendants, hereby certify that on August 1, 2018, Plaintiffs assented to this motion.

/s/ Pamela C. Rutkowski

Pamela C. Rutkowski

CERTIFICATE OF SERVICE

I hereby certify that on August 2, 2018, the foregoing document(s) filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF):

John L. Fink, Esq.
FINK LAW OFFICE
18 Lyman Street, Suite 208
J&N Professional Building
Westborough, MA 01581
Co-Counsel for Plaintiff

David C. Parisi, *Pro Hac Vice*
Suzanne Havens Beckman, *Pro Hac Vice*
PARISI & HAVENS LLP
212 Marine Street, Unit 100
Santa Monica, CA 90405
Co-Counsel for Plaintiff

Yitzchak H. Lieberman, *Pro Hac Vice*
Grace E. Parasmó, *Pro Hac Vice*
PARASMO LIEBERMAN LAW
7400 Hollywood Blvd., Suite 505
Los Angeles, CA 90046
Co-Counsel for Plaintiff

Ethan M. Preston (*Pro Hac Vice*)
PRESTON LAW OFFICES
4054 McKinney Avenue
Suite 310
Dallas, TX 75204
Co-Counsel for Plaintiff

Matthew R Mendelsohn
Mazie Slater Katz & Freeman, LLC
103 Eisenhower Parkway
Roseland, NJ 07068
Co-Counsel for Plaintiff

Date: August 2, 2018

/s/ Pamela C. Rutkowski
Pamela C. Rutkowski